

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

JAMES HILL,)	
Plaintiff,)	
)	CAUSE NO.: 2:10-CV-393-JTM-PRC
v.)	
)	
MICHAEL SOLAN and)	
CITY OF HAMMOND, INDIANA)	
et al)	
Defendant.)	

PLAINTIFF'S PETITION FOR ATTORNEYS' FEES AND COSTS

Plaintiff James Hill, by his attorneys Scott King and Lakeisha Murdaugh of the Law Offices of King & Murdaugh LLC., and Russel Brown of the Region Lawyers, petitions for attorneys' fees in this matter as follows:

1. On November 22, 2022, this Court entered a verdict in favor of Mr. Hill in the amount of \$25,500,000.00.
2. As a result of this verdict, Mr. Hill is a prevailing party on his § 1983 claims as a matter of law, and is thus entitled to an additional award of attorneys' fees and costs pursuant to 42 U.S.C. § 1988.
3. In order to prevail in this matter, and as detailed in the affidavits and time sheets, plaintiff's attorneys reasonably spent the following hours on the litigation: King 134.10; Brown 245.90; Murdaugh 309.80. Attachments A, C and D.
4. The reasonable hourly rate for plaintiff's attorneys are as follows: King \$350; Brown \$350; Murdaugh \$350. Attachments A, C and D.

5. Attorney Mitchell A. Peters represented James Hill in the above-captioned matter from July 12, 2010 until (insert date Scott was retained). At the conservative rate of \$200 per hour, Attorney Peters reasonable attorney fee is \$300,000.00. Attachment B.

6. Plaintiff also expended costs in order to litigate this case. The reasonable costs expended by the plaintiff and chargeable to the defendants under 42 U.S.C. § 1988 amount to \$8,593.59 advanced by the Law Offices of King & Murdaugh LLC. and \$34,849.27 advanced by Attorney Mitchell Peters, Attorney Robert Harper and Attorney Kevin Vanderground, for a total of \$43,442.86 in chargeable costs. Attachments B & E.

Wherefore, plaintiff requests that this court award attorneys' fees and costs in the amount of \$541,430.00, as well as all attorneys' fees and costs expended in determining this fee award.

Dated: February 7, 2023

Respectfully Submitted,

/s/ Scott King
Scott King, #5208-45
9211 Broadway
Merrillville, IN 46410
(219) 769-6300

/s/ Lakeisha Murdaugh
Lakeisha Murdaugh, #30784-45
9211 Broadway
Merrillville, IN 46410
(219) 769-6300

/s/ Russell Brown
Russell Brown, #29628-64
9223 Broadway
Merrillville, IN 46410
(219) 750-9380

NOTICE OF FILING AND CERTIFICATE OF SERVICE

To: David Jensen
Rob Feldt

Donald Levinson
Shana Levinson

Please take notice that on February 7, 2023 I filed with the clerk of the United States District Court for the Northern District of Indiana the attached **PLAINTIFF'S PETITION FOR ATTORNEYS' FEES AND COSTS**, a copy of which is served upon you by the court's electronic filing system.

Professional = Scott King (Active Only)
 Group By Professional Group
 Client - Matter = Hill v. City of Hammond et al 2:10-
 CV-393 (Active Only)
 Task Code = All
 View = Original
 From 01-01-2017 To 02-06-2023

Time Entries

Law Offices of King & Murdaugh, LLC

James Hill

Hill v. City of Hammond et al 2:10-CV-393

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
09-20-2017	Approved	Conference with opposing counsel	Billable	Attorney Conference	King, Scott			0.600	350.00	210.00
09-22-2017	Approved	Conference with opposing counsel	Billable	Attorney Conference	King, Scott			0.600	350.00	210.00
09-25-2017	Approved	Conference with opposing counsel	Billable	Attorney Conference	King, Scott			0.600	350.00	210.00
12-26-2017	Approved		Billable	P400 - Initial Document Preparation / Filing	King, Scott			0.500	350.00	175.00
08-02-2019	Approved	Prepare, File Appearance	Billable	L650 - Review (NOS)	King, Scott			2.200	350.00	770.00
09-20-2019	Approved	Review Motion for Summary Judgement	Billable	L650 - Review (NOS)	King, Scott			1.100	350.00	385.00
09-20-2019	Approved	Review Response to Motion for Summary Judgement	Billable	Attorney Conference	King, Scott			0.600	350.00	210.00
10-10-2019	Approved	Conference with opposing counsel	Billable	Document Review	King, Scott			0.700	350.00	245.00
03-25-2020	Approved	Review Reply to Motion for Summary Judgement	Billable	Document Review	King, Scott			0.400	350.00	140.00
04-14-2022	Approved	Review Order Denying to Motion for Summary Judgement	Billable	Telephone Call	King, Scott			0.800	350.00	280.00
05-05-2022	Approved	Telephone Conference with Court/Parties	Billable	Telephone Call	King, Scott			0.300	350.00	105.00
06-18-2022	Approved	Telephone Conference with Magistrate/Parties	Billable	Draft Document	King, Scott			1.000	350.00	350.00
06-24-2022	Approved	Draft Settlement Submission	Billable	Conference	King, Scott			3.000	350.00	1,050.00
08-29-2022	Approved	Settlement Conference	Billable	Conference	King, Scott			0.300	350.00	105.00
09-02-2022	Approved	Draft email to Magistrate	Billable	Draft Document	King, Scott			0.300	350.00	105.00
09-20-2022	Approved	Review/Draft Motion in Limine	Billable	Draft Document	King, Scott			1.200	350.00	420.00
10-01-2022	Approved	Review/Draft Jury Instructions	Billable	Draft Document	King, Scott			0.500	350.00	175.00

EXHIBIT

A

02-06-2023 14:23:07

Professional = Scott King (Active Only)
Group By Professional Group
Client - Matter = Hill v. City of Hammond et al 2:10-
CV-393 (Active Only)
Task Code = All
View = Original
From 01-01-2017 To 02-06-2023

Time Entries

Law Offices of King & Murdaugh, LLC

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
10-05-2022	Approved	Review Pretrial Order	Billable	Document Review	King, Scott			0.400	350.00	140.00
10-05-2022	Approved	Research/ Draft Response to Defendant's Motion in Limine	Billable	Legal Research	King, Scott			7.500	350.00	2,625.00
10-06-2022	Approved	Research/ Draft Response to Defendant's Motion in Limine	Billable	Legal Research	King, Scott			6.000	350.00	2,100.00
10-07-2022	Approved	Review Order on Motion to Strike	Billable	Document Review	King, Scott			0.300	350.00	105.00
10-21-2022	Approved	Settlement Conference.	Billable	Conference	King, Scott			2.000	350.00	700.00
10-24-2022	Approved	Pretrial Conference	Billable	Conference	King, Scott			0.500	350.00	175.00
10-25-2022	Approved	Review Pretrial Order; conference	Billable	Document Review	King, Scott			0.600	350.00	210.00
10-26-2022	Approved	Review Propose Instructions	Billable	Document Review	King, Scott			0.500	350.00	175.00
11-04-2022	Approved	Status Conference	Billable	Conference	King, Scott			0.500	350.00	175.00
11-05-2022	Approved	Review File	Billable	Document Review	King, Scott			11.000	350.00	3,850.00
11-06-2022	Approved	Review File	Billable	Document Review	King, Scott			12.000	350.00	4,200.00
11-07-2022	Approved		Billable	Attend court for trial. Travel included.	King, Scott			36.000	350.00	12,600.00
11-17-2022	Approved		Billable	Attend court for trial. Travel included.	King, Scott			18.000	350.00	6,300.00
11-21-2022	Approved		Billable	Attend court for trial. Travel included.	King, Scott			18.000	350.00	6,300.00
12-12-2022	Approved	draft/file motion	Billable	Draft Document	King, Scott			2.000	350.00	700.00
12-29-2022	Approved	Draft/file response	Billable	Draft Document	King, Scott			1.000	350.00	350.00

Professional = Scott King (Active Only)
Group By Professional Group
Client - Matter = Hill v. City of Hammond et al 2:10-
CV-393 (Active Only)
Task Code = All
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From 01-01-2017 To 02-06-2023

Time Entries
Law Offices of King & Murdaugh, LLC

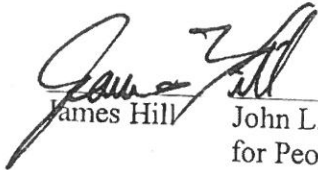
Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
01-10-2023	Approved	Read Case Law and preparation of reply motion.	Billable	Document Review	King, Scott			2.000	350.00	700.00
01-10-2023	Approved	reviewed court order	Billable	Document Review	King, Scott			0.100	350.00	35.00
01-24-2023	Approved	received and read the courts opinion and order	Billable	Document Review	King, Scott			1.000	350.00	350.00
Matter Total								134.100		46,935.00
Client Total								134.100		46,935.00
Grand Total								134.100		46,935.00

RETAINER AGREEMENT

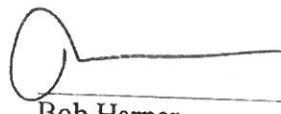
James Hill, client, MillerFisher Law LLC, Harper and Rogers and People's Law Office, agree as follows:


1. Attorneys will represent client in the cause of action occurring in 1981 and thereafter in which client was falsely convicted in Lake County, Indiana and falsely imprisoned.
2. If no recovery is made the client shall owe no attorneys' fees.
3. This is the type of case in which attorney fees may be awarded separately from any recovery to the plaintiff. Because of this, if there is a recovery in the case then client agrees to pay to the attorney a contingent fee, computed as follows. If the case is resolved by settlement prior to trial then the attorneys will receive the greater of (a) one third of the total amount recovered or (b) an amount computed by multiplying the number of hours reasonably worked on the case by attorneys by each attorney's reasonable hourly rate. If the attorney elects to receive payment pursuant to section(b) above, he will inform the client of this prior to the settlement being agreed to. If the case goes to trial and there is an award in favor of the client then the attorney will receive the greater of (a) the reasonable attorney fees awarded by the court or agreed to by the parties, or (b) one third of the total amount recovered, including attorney fees if any.
4. Client is liable for all costs associated with this case. Costs include the court filing fee, costs reasonably incurred in serving the defendants, costs for serving subpoenas for discovery or trial, costs incurred in obtaining documents or other materials for use in the litigation (including, but not limited to, costs incurred in obtaining documents or other materials through discovery), witness fees and costs including subpoena costs and fees and costs paid to witnesses (including expert witness fees), court reporter fees and costs, costs for obtaining and duplicating depositions, travel costs reasonably incurred by attorneys, copying and printing costs for preparing pleadings in the case, and costs incurred in preparing exhibits for use in the litigation. Costs shall be prepaid by the client or paid from the client's share of the recovery.
5. No settlement shall be made without the consent of the client.
6. In the event that the client obtains different lawyers to represent him in this matter prior to final resolution, the undersigned attorneys shall be entitled to a fee of the reasonable value of services provided, which shall be the greater of either (a) one third of the total amount then being offered in settlement, or (b) an amount equal to the number of hours spent by each attorney multiplied by the hourly rate of that attorney.
7. Client acknowledges receipt of a copy of this agreement.

Dated: July 12, 2010


James Hill

John L. Stainthorp
for People's Law Office


Bob Harper
for Harper and Rogers


Mitch Peters
for MillerFisher Law LLC



MITCHELL A. PETERS

ATTORNEY AT LAW LLC

Mitchell A. Peters
mitchpeterslaw@gmail.com

750 S. Washington Street
Valparaiso, IN 46383
Telephone: (219) 510-5908
Facsimile: (219) 654-2277

June 2, 2022

Mr. Scott L. King
King & Murdaugh
9211 Broadway
Merrillville, Indiana 46410

Via Email: scott@kingmurdaughlaw.com

Re: James Hill

Dear Attorney King:

As you are aware, I represented James Hill over a number of years in regards to his wrongful conviction for the rape of Lisa Jaynes. My representation of James began in the latter part of 2003 until his second wrongful indictment for murder in Lake County, Indiana, in 2016. Excluding the criminal representation in the first wrongful indictment for murder, the Post-Conviction Relief matter, including all of the investigation, discovery, review of records, litigation, court proceedings and appeal was extremely complex and time consuming.

Although my entire file was turned over some years ago, in looking back over my computer files and my recollection of living with that case for a number of years, taking the depositions, the PCR trial, all of the ancillary motions and hearings, the appeal, etc, I easily had expended 1500 hours into the case over the span of years I represented James. This would be only in relation to the post-conviction relief matters; however, all of the four cases were always interrelated by the State and defense factually. At the conservative rate of \$200.00 per hour, my reasonable attorney fee in this matter would be \$300,000.00.

I have reviewed the expenses advanced in pursuit of these matters, as well as those of Attorney Robert Harper and Attorney Kevin Vanderground. The total amount advanced on behalf of James Hill is in the sum of \$34,849.27 as set forth on the itemizations included herewith.

I trust that this gives you some insight into my fees and expenses. I could specifically go through the files that you have, as well as my entire electronic record of the case, and the the number of hours expended would probably increase. I believe this is a fair and reasonable representation of my fees and expenses in this matter as they relate to the representation of James Hill in his Post-Conviction Relief matter.

ATTORNEY AT LAW LLC

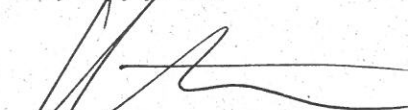
Mr. Scott L. King

June 2, 2022

Page Two

Should you have any questions regarding this matter, please contact me. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'MAP', followed by a long horizontal flourish.

MITCHELL A. PETERS

MAP:dlz

Enclosures

MAP	JAMES HILL		FILE NO.	04-121/MAP	AMOUNT	BALANCE
DATE	CHECK NO.	VENDOR				
04-17-2005	CK #400	REBECCA HAMANN, RPR	DEPOSITION	04-121/MAP	\$ 593.50	\$ 593.50
06-09-2005	CK #457	REBECCA HAMANN, RPR	DEPOSITION	04-121/MAP	\$ 337.00	\$ 930.50
10-20-2005	CK #636	REBECCA HAMANN, RPR	DEPOSITION	04-121/MAP	\$ 579.00	\$ 1,509.50
12-29-2005	CK #737	DEBRA BANACH	TRANSCRIPT	04-121/MAP	\$ 125.00	\$ 1,634.50
12-16-2005	CK #798	REPORTERS PAPER & MANUFACTURING	DEPOSITION	04-121/MAP	\$ 144.78	\$ 1,779.28
04-27-2006	CK #890	REBECCA HAMANN, RPR	DEPOSITION	04-121/MAP	\$ 624.00	\$ 2,403.28
07-27-2006	CK #1025	CLERK, LAKE SUPERIOR COURT	FILING FEE	04-121/MAP	\$ 65.00	\$ 2,468.28
08-09-2006	CK #1042	FEDERAL EXPRESS	POSTAGE	04-121/MAP	\$ 19.72	\$ 2,488.00
08-30-2006	CK #1068	REBECCA HAMANN, RPR	DEPOSITION	04-121/MAP	\$ 251.20	\$ 2,739.20
06-27-2007	CK #1495	REBECCA HAMANN, RPR	DEPOSITION	04-121/MAP	\$ 254.25	\$ 2,993.45
07-12-2007	CK #1511	REBECCA HAMANN, RPR	DEPOSITION	04-121/MAP	\$ 243.25	\$ 3,236.70
10-12-2007	CK #1635	JAN SCHRADER	TRANSCRIPT	04-121/MAP	\$ 50.00	\$ 3,286.70
10-17-2007	CK #1638	REBECCA HAMANN, RPR	DEPOSITION	04-121/MAP	\$ 361.75	\$ 3,648.45
03-26-2009	CK #2315	FEDERAL EXPRESS	POSTAGE	04-121/MAP	\$ 14.47	\$ 3,662.92
05-07-2009	CK #2355	DR. STAN LELEK	PROF. FEES	04-121/MAP	\$ 270.00	\$ 3,932.92
05-15-2009	CK #2365	JAN SCHRADER	TRANSCRIPT	04-121/MAP	\$ 3,780.00	\$ 7,712.92
05-21-2009		DEPOSIT - ROBERT P. HARPER	SHARE OF EXP	04-121/MAP	\$ (2,500.00)	\$ 5,212.92
06-25-2009		DEPOSIT - ROBERT P. HARPER	SHARE OF EXP	04-121/MAP	\$ (1,500.00)	\$ 3,712.92
10-30-2009	CK #2591	CLERK, INDIANA COURT OF APPEALS	FILING FEE	04-121/MAP	\$ 250.00	\$ 3,962.92
11-25-2009	CK #2551	DEBRA BANACH	FILING FEE	04-121/MAP	\$ 40.50	\$ 4,003.42
11-25-2009	CK # 2552	JAN SCHRADER	FILING FEE	04-121/MAP	\$ 1,156.50	\$ 5,159.92
11-25-2009		DEPOSIT - ROBERT P. HARPER	SHARE OF EXP	04-121/MAP	\$ (1,200.00)	\$ 3,959.92
12-23-2009	CK #2602	FEDERAL EXPRESS	POSTAGE	04-121/MAP	\$ 14.72	\$ 3,974.64
'01-28-2010	CK #2643	U.S. POSTAL SERVICE	POSTAGE	04-121/MAP	\$ 16.75	\$ 3,991.39
02-25-2010	CK #2676	FEDERAL EXPRESS	POSTAGE	04-121/MAP	\$ 15.21	\$ 4,006.60
03-16-2010	CK #2690	FEDERAL EXPRESS	POSTAGE	04-121/MAP	\$ 19.47	\$ 4,026.07
09-16-2010	CK #2925	CLERK, U.S. DISTRICT COURT	FILING FEE	04-121/MAP	\$ 350.00	\$ 4,376.07
10-14-2010	CK #2964	U.S. POSTAL SERVICE	POSTAGE	04-121/MAP	\$ 36.30	\$ 4,412.37
03-17-2011	CK #3172	GETZ INVESTIGATIONS	PROF. FEES	04-121/MAP	\$ 235.00	\$ 4,647.37
01-05-2012	CK #3516	KAREN PRICE & ASSOCIATES	DEPOSITION	04-121/MAP	\$ 583.00	\$ 5,230.37
05-17-2012	CK #3687	GETZ INVESTIGATIONS	PROF. FEES	04-121/MAP	\$ 140.00	\$ 5,370.37
11-29-2012	CK #3926	KAREN PRICE & ASSOCIATES	DEPOSITION	04-121/MAP	\$ 266.35	\$ 5,636.72
05-02-2013	CK #4078	STEWART RICHARDSON	DEPOSITION	04-121/MAP	\$ 207.31	\$ 5,844.03
06-20-2013	CK #4115	STEWART RICHARDSON	DEPOSITION	04-121/MAP	\$ 206.71	\$ 6,050.74
08-29-2013	CK #4174	STEWART RICHARDSON	DEPOSITION	04-121/MAP	\$ 585.36	\$ 6,636.10
09-19-2013	CK #4204	STEWART RICHARDSON	DEPOSITION	04-121/MAP	\$ 302.50	\$ 6,938.60
09-26-2013	CK #4209	STEWART RICHARDSON	DEPOSITION	04-121/MAP	\$ 472.50	\$ 7,411.10
11-07-2013	CK #4249	RUSSELL FISCHER	PROF. FEES	04-121/MAP	\$ 3,000.00	\$ 10,411.10
05-08-2014	CK #4390	RUSSELL FISCHER	PROF. FEES	04-121/MAP	\$ 5,467.08	\$ 15,878.18
05-08-2014	CK #4395	KEVIN VANDERGROUND	SPLIT OF ADVANCE	04-121/MAP	\$ 532.92	\$ 16,411.10
06-01-2014	CK #4396	KEVIN VANDERGROUND	SPLIT OF ADVANCE	04-121/MAP	\$ 305.45	\$ 16,716.55
07-10-2014	CK #4401	STEWART RICHARDSON	DEPOSITION	04-121/MAP	\$ 749.25	\$ 17,465.80
					\$ -	\$ 17,465.80

ROBERT	HARPER	JAMES HILL	FILE NO.	RPH		\$
DATE	CHECK NO.	VENDOR			AMOUNT	BALANCE
07-25-2003	CK #10899	GETZ INVESTIGATIONS	INVESTIGATION	RPH	\$ 563.50	\$ 563.50
10-26-2004	CK #636	BREHON REPORTING	DEPOSITION	RPH	\$ 524.00	\$ 1,087.50
11-28-2005	CK #1099	STEVEN LYNN	WITNESS FEE	RPH	\$ 2,000.00	\$ 3,087.50
02-21-2007	CK #1025	BOSS REPORTING	DEPOSITION	RPH	\$ 2,406.74	\$ 5,494.24
05-08-2008	CK #10111	DOCU-TECH	EXHIBITS	RPH	\$ 67.20	\$ 5,561.44
06-08-2008	CK #10148	DOCU-TECH	EXHIBITS	RPH	\$ 40.00	\$ 5,601.44
05-21-2009	CK #10448	MITCHELL A. PETERS	SHARE OF ADV	RPH	\$ 2,500.00	\$ 8,101.44
06-24-2009	CK #10470	MITCHELL A. PETERS	SHARE OF ADV	RPH	\$ 1,500.00	\$ 9,601.44
09-04-2009	CK #10536	GETZ INVESTIGATIONS	SERVICE	RPH	\$ 1,114.95	\$ 10,716.39
11-24-2009	CK #10612	MITCHELL A. PETERS	SHARE OF ADV	RPH	\$ 1,200.00	\$ 11,916.39
04-25-2014	CK #12110	RUSSELL FISCHER	EXPERT WITNESS/RP	RPH	\$ 5,467.08	\$ 17,383.47
					\$	\$

	RECAPITULATION					
	MITCHELL A. PETERS					\$ 17,465.80
	ROBERT P. HARPER					\$ 17,383.47
TOTAL:	TOTAL ADVANCEMENTS:					\$ 34,849.27

Activities Export

02/01/2023
5:01 PM

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/24/2023		Review and analyze: Review and analyze Court's opinion and order. 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
01/15/2023		Draft and revise: Draft response to Defendant's sur-reply regarding prejudgment interest. 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.50h	\$350.00	-	\$1,225.00
01/14/2023		Legal research: Regarding prejudgment interest. Reviewed and analyzed all filed pleadings regarding prejudgment interest 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	4.00h	\$350.00	-	\$1,400.00
12/11/2022		Review and analyze: File and filings for upcoming supplemental discovery responses. Drafted interoffice e-mail communication to co-counsel regarding the same. 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	5.00h	\$350.00	-	\$1,750.00
12/11/2022		Review and analyze: Received and reviewed e-mail communication between co-counsel and outside counsel regarding status of similar litigation 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
11/22/2022		Court appearance: Travel to and from court and attended day 8 of trial 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	12.00h	\$350.00	-	\$4,200.00
11/21/2022		Court appearance: Travel to and	01973-HILL	Russell	10.00h	\$350.00	-	\$3,500.00
					245.90h		\$0.00 0.00h	\$86,065.00 245.90h

EXHIBIT








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1/14

Activities Export

02/01/2023
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 13 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/19/2022		from court and attended day 7 of trial ● Draft invoice 286	Hill v. City of Hammond 2:10-CV-393	Brown	4.00h	\$350.00	-	\$1,400.00
11/18/2022		Review and analyze: Motion for Directed verdict. Researched cases. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	10.00h	\$350.00	-	\$3,500.00
11/17/2022		Court appearance: Travel to and from court and attended trial for day 6 ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	10.00h	\$350.00	-	\$3,500.00
11/16/2022		Court appearance: Travel to and from court and attended day 5 of trial ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
11/13/2022		Draft and revise: Supplemental Motion in Limine regarding Defendants' Expert Witness ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
11/11/2022		Draft and revise: Researched, drafted and revised response for Motion for Directed Verdict ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
11/10/2022		Plan and prepare for: trial by reviewing Defendant's expert report and deposition. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell	4.00h	\$350.00	-	\$1,400.00
					245.90h		\$0.00 0.00h	\$86,065.00 245.90h

Activities Export

02/01/2023
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USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 14 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/10/2022		and reviewed notes to prepare for anticipated Motion for Directed Verdict of Defendant ● Draft invoice 286	Hill v. City of Hammond 2:10-CV-393	Brown	1.00h	\$350.00	-	\$350.00
11/10/2022		Attended: meeting with co-counsel ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	4.00h	\$350.00	-	\$1,400.00
11/09/2022		Court appearance: Travel to and from court for day 4 of trial ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	10.00h	\$350.00	-	\$3,500.00
11/08/2022		Court appearance: Travel to and from court and attend day 2 of trial ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
11/07/2022		Court appearance: Travel to and from court for trial, attended first day of trial. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.00h	\$350.00	-	\$1,050.00
11/06/2022		Reviewed transcripts of trial and noted redactions. Drafted list for opposing counsel. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	245.90h	\$0.00	\$86,065.00	\$86,065.00
11/06/2022		Plan and prepare for: Jury selection and opening statement ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.00h	0.00h	245.90h	245.90h
					245.90h	\$0.00	\$86,065.00	\$86,065.00

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/05/2022		Plan and prepare for: Jury selection and opening statement ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
11/04/2022		Court appearance: Telephone conference with court regarding upcoming trial. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
11/02/2022		Plan and prepare for: trial by reviewing testimony from Larry Mayes' trial ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	5.00h	\$350.00	-	\$1,750.00
10/31/2022		Draft and revise: E-mail communication with opposing counsel ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
10/30/2022		Plan and prepare for: trial by reviewing client's prior testimony ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
10/29/2022		Plan and prepare for: trial by reviewing Defendant Solan's prior testimony ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	6.00h	\$350.00	-	\$2,100.00
10/25/2022		Review and analyze: Reviewed and analyzed transcript of FPTC from 10-24-22. Communicated with co-counsel regarding the same. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
10/18/2022		Draft and revise: Motion to	01973-HILL	Russell	1.00h	\$350.00	-	\$350.00
					245.90h			\$0.00
								\$86,065.00
								0.00h
								245.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/18/2022		Reconsider Order striking Attorney Vanes ● Draft invoice 286	Hill v. City of Hammond 2:10-CV-393	Brown				
10/18/2022		Draft and revise: Received and Reviewed draft of Supplemental Settlement Memo, made edits and comments, sent draft to co-counsel ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
10/17/2022		Received and reviewed draft response to Defendant's Motion in Limine. Drafted edits and comments to co-counsel ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
10/16/2022		Review and analyze: Received and reviewed co-counsel's memo on duty to disclose Brady information post conviction ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
10/12/2022		Attended: Interoffice meeting with co-counsel regarding upcoming trial ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.00h	\$350.00	-	\$1,050.00
10/03/2022		Draft and revise: Researched and drafted Motion in limine ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	5.00h	\$350.00	-	\$1,750.00
10/03/2022		Review and analyze: draft Motion in limine from co-counsel ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.20h	\$350.00	-	\$420.00
					245.90h		\$0.00 0.00h	\$86,065.00 245.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/02/2022		Legal research: Regarding jury instructions. Drafted proposed jury instructions  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.50h	\$350.00	-	\$1,225.00
09/26/2022		Draft and revise: Plaintiff's witness and exhibit list  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.50h	\$350.00	-	\$875.00
09/23/2022		e-mail communication with opposing counsel regarding Plaintiff's witness and exhibit list.  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
09/21/2022		Draft and revise: Received and reviewed Defendant's motion to strike witnesses. Draft response to Motion to Strike.  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
09/19/2022		Draft and revise: Plaintiff's contribution to pretrial order  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
08/22/2022		Draft and revise: Draft response to Defendant's motion to strike experts  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
08/19/2022		Attended: Conference with Attorney David Jensen via Teams  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
08/15/2022		Review and analyze: Reviewed Defendant's Motion to Strike	01973-HILL Hill v. City of Hammond	Russell Brown	0.75h	\$350.00	-	\$262.50
					245.90h		\$0.00	\$86,065.00
							0.00h	245.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Experts.								
● Draft invoice 286								
07/15/2022		Review and analyze: Transcript of Hill's criminal trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	5.00h	\$350.00	-	\$1,750.00
● Draft invoice 286								
07/12/2022		Review and analyze: Transcript of Hill's original criminal trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.00h	\$350.00	-	\$1,050.00
● Draft invoice 286								
07/11/2022		Review and analyze: Reviewed transcript of Hill's criminal trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.50h	\$350.00	-	\$1,225.00
● Draft invoice 286								
07/11/2022		Reviewed file and uploaded supplemental discovery via google drive to share with co-counsel	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
● Draft invoice 286								
07/01/2022		Draft and revise: Draft and sent to opposing counsel Plaintiffs supplemental discovery responses	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
● Draft invoice 286								
07/01/2022		Review and analyze: Received and reviewed e-mail from opposing counsel regarding supplemental discovery responses.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
● Draft invoice 286								
06/24/2022		Attended: Settlement conference	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	4.00h	\$350.00	-	\$1,400.00
● Draft invoice 286								
					245.90h	\$0.00	\$86,065.00	
						0.00h	245.90h	

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








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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/23/2022		Plan and prepare for: Judicial settlement conference ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.20h	\$350.00	-	\$420.00
06/20/2022		Draft and revise: E-mail to Magistrate Martin's chambers regarding the settlement submission ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
06/20/2022		Review and analyze: Received and reviewed loss earnings report from Mr. Gibson ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
06/17/2022		Office conference with: Mr. Gibson via e-mail regarding status of completion of economic report. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.30h	\$350.00	-	\$105.00
06/13/2022		Review and analyze: Latest draft of confidential settlement statement ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
06/10/2022		Telephone conference with: Mr. Gibson regarding obtaining social security report of client. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.30h	\$350.00	-	\$105.00
06/10/2022		Draft and revise: Confidential settlement statement for upcoming judicial settlement conference ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
06/07/2022		Review and analyze: Received and	01973-HILL	Russell	1.50h	\$350.00	-	\$525.00
					245.90h			\$86,065.00
							\$0.00	\$86,065.00
							0.00h	245.90h

Activities Export

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







Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/03/2022		reviewed co-counsel's drafts regarding confidential settlement statement.  Draft invoice 286	Hill v. City of Hammond 2:10-CV-393	Brown	3.00h	\$350.00	-	\$1,050.00
06/03/2022		Legal research: Legal research regarding the admissibility of State's PCR order. Draft interoffice e-mail to co-counsel regarding the status of research  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
06/03/2022		Draft and revise: Draft interoffice e-mail summarizing telephone conference  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
05/24/2022		Several e-mail communications with Mr. Gibson regarding the case. Telephone conference with Mr. Gibson.  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.80h	\$350.00	-	\$280.00
05/20/2022		Legal research: Regarding jury instructions. Draft e-mail to co-counsel regarding upcoming settlement conference and settlement statement  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
						245.90h	\$0.00 0.00h	\$86,065.00 245.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/18/2022		Several e-mail communication between co-counsel and Mr. Gibson regarding materials needed for his evaluation  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
05/17/2022		Received and drafted several e-mail correspondence between co-counsel  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
05/17/2022		Review and analyze: Received and reviewed client's memorandum  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
05/14/2022		Review and analyze: Received and reviewed Gibson fee agreement and CV. Drafted interoffice e-mail to co-counsel.  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
05/13/2022		Legal research: Researched potential economic experts. Telephone conference with Mr. Gibson. Received e-mail with Gibson's testimony report.  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.50h	\$350.00	-	\$875.00
05/10/2022		Review and analyze: Received and reviewed draft narrative from co-counsel regarding confidential settlement statement.  Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.75h	\$350.00	-	\$262.50
05/05/2022		Prepare for and attend telephone	01973-HILL	Russell	0.50h	\$350.00	-	\$175.00
					245.90h		\$0.00 0.00h	\$86,065.00 245.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/03/2022		conference with Court ● Draft invoice 286	Hill v. City of Hammond 2:10-CV-393	Brown				
05/03/2022		Review and analyze: Draft timeline of events by co-counsel. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.30h	\$350.00	-	\$105.00
05/03/2022		Review and analyze: Received and reviewed interoffice memorandum regarding timeline of events from co-counsel ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
04/27/2022		Legal research: Conducted legal research on prejudgment interest. Drafted interoffice e-mail to co-counsel regarding the same. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
04/26/2022		Filed Parties' Stipulation for Judicial Settlement Conference ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
04/26/2022		Draft and revise: Draft e-mail to opposing counsel with draft stipulation for judicial settlement conference ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
04/26/2022		Draft and revise: Draft Stipulation for Judicial Settlement Conference. Sent to co-counsel for review and comment. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
						245.90h	\$0.00 0.00h	\$86,065.00 245.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/18/2022		Review and analyze: Received and reviewed e-mail communication from co-counsel regarding agenda for upcoming interoffice meeting. 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
04/18/2022		Review and analyze: Received and reviewed several e-mail communications from opposing counsel and co-counsel regarding the status of settlement conference. 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
04/04/2022		Office conference with: Drafted interoffice email to co-counsel regarding status of file organization. Reviewed database regarding file. 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
05/12/2021		Draft and revise: Notice of Additional Authority in support of Plaintiffs Response to Defendants' Supplemental Motion for Summary Judgement. 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.30h	\$350.00	-	\$105.00
09/23/2019		Draft and revise: Review and analyze Defendants' Supplemental Motion for Summary Judgement. Draft Plaintiffs Response. Draft Motion for Belated Filing 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	5.00h	\$350.00	-	\$1,750.00
						245.90h	\$0.00 0.00h	\$86,065.00 245.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/21/2019		Review and analyze: Defendants' Supplemental Motion for Summary Judgement and Appendix 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.50h	\$350.00	-	\$875.00
09/20/2019		Review and analyze: Review Plaintiffs Supplemental Motion for Summary Judgment and Appendix 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
09/13/2019		Telephone conference with: E-mail communication with opposing counsel regarding extension of time to file Plaintiffs Response to Defendants' Supplemental Motion for Summary Judgment. 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
08/28/2019		Draft and revise: Draft and filed Motion for Extension of Time to respond to Plaintiffs Supplemental Motion for Summary Judgment 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
06/07/2019		Review and analyze: Reviewed and catalog file 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
06/06/2019		Review and analyze: Reviewed and catalog file 	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
05/31/2019		Draft and revise: Draft and filed Plaintiffs Objection to Defendants' Motion for Supplemental MSJ	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
						245.90h	\$0.00 0.00h	\$86,065.00 245.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Draft invoice 286						
05/29/2019	⌚	Review and analyze: Reviewed and catalog contents of file	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.50h	\$350.00	-	\$875.00
		● Draft invoice 286						
05/28/2019	⌚	Review and analyze: Reviewed filed to organize and catalog	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
		● Draft invoice 286						
05/23/2019	⌚	Draft and revise: Draft and Filed Appearance	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
		● Draft invoice 286						
					245.90h		\$0.00 0.00h	\$86,065.00 245.90h

Time Entries**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)
 Group By Professional Group
 Client - Matter = Hill v. City of Hammond et al 2:10-
 CV-393 (Active Only)
 Task Code = All
 View = Original
 From 01-01-2022 To 01-27-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
04-04-2022	Approved		Billable	Attorney Conference	Murdaugh, Lakeisha			0.500	350.00	175.00
				Meeting with co-counsel regarding trial preparation and trial strategy.						
04-14-2022	Approved		Billable	Court	Murdaugh, Lakeisha			0.500	350.00	175.00
				Attended status conference.						
04-14-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.000	350.00	350.00
				Meeting with Hill regarding case updates, mediation and trial.						
04-18-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Received and reviewed email regarding mediation.						
04-18-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
				Received and reviewed email from co-counsel.						
04-26-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.300	350.00	105.00
				Reviewed and analyzed proposed stipulation for upcoming settlement conference.						
04-27-2022	Approved		Billable	Email	Murdaugh, Lakeisha			1.500	350.00	525.00
				Reviewed and analyzed email from co-counsel regarding prejudgment interest.						
04-30-2022	Approved		Billable	Draft Document	Murdaugh, Lakeisha			5.500	350.00	1,925.00
				Reviewed Police Reports Volumes I & II and Solan's notes. Created timeline for James Hill cases.						
05-03-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
				Sent email to co-counsel regarding Hill's case timeline.						
05-05-2022	Approved		Billable	Court	Murdaugh, Lakeisha			0.500	350.00	175.00
				Attended court telephonically.						
05-05-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			2.500	350.00	875.00
				Meeting with Hill regarding case updates, mediation and trial.						
05-10-2022	Approved		Billable	Email	Murdaugh, Lakeisha			1.200	350.00	420.00
				Reviewed, analyzed and edited draft from co-counsel regarding Hill's settlement statement.						
05-12-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.000	350.00	350.00
				Meeting with Hill regarding case updates, mediation and trial.						
05-14-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.400	350.00	140.00
				Received and reviewed expert report.						
05-18-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.300	350.00	105.00
				Received emails regarding expert materials.						
05-18-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			5.300	350.00	1,855.00
				Reviewed case files and gather materials requested by expert.						
05-20-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.600	350.00	210.00
				Reviewed, analyzed and responded to emails.						

01-27-2023 07:46:01

Page 1 of 8

EXHIBIT

D

tabbles

Time Entries**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)
 Group By: Professional Group
 Client - Matter = Hill v. City of Hammond et al 2:10-
 CV-393 (Active Only)
 Task Code = All
 View = Original
 From 01-01-2022 To 01-27-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
05-24-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
	Reviewed, analyzed and responded to emails.									
05-24-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.000	350.00	350.00
	Meeting with Hill regarding case updates, mediation and trial.									
06-03-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.500	350.00	175.00
	Reviewed emails from economist expert.									
06-04-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
	Review emails from co-counsel.									
06-06-2022	Approved		Billable	Draft Document	Murdaugh, Lakeisha			3.800	350.00	1,330.00
	Drafted settlement submission.									
06-07-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.900	350.00	315.00
	Reviewed emails from co-counsel regarding settlement statement and edited draft statement.									
06-10-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.400	350.00	140.00
	Received and reviewed emails from co-counsel and economist expert.									
06-10-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.400	350.00	140.00
	Received and reviewed emails from co-counsel and economist expert.									
06-13-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.500	350.00	175.00
	Received and reviewed emails from co-counsel regarding settlement conference submission.									
06-20-2022	Approved		Billable	Email	Murdaugh, Lakeisha			1.800	350.00	630.00
	Received and reviewed Hill's lost earning report from economist.									
06-20-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.000	350.00	350.00
	Meeting with Hill regarding case updates, mediation and trial.									
06-21-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.300	350.00	105.00
	Received, reviewed and responded to emails between co-counsel regarding settlement submission.									
06-21-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.300	350.00	105.00
	Received, reviewed and responded to emails between co-counsel regarding settlement submission.									
06-24-2022	Approved		Billable	Settlement Conference	Murdaugh, Lakeisha			4.000	350.00	1,400.00
	Meeting with opposing counsel in attempt to reach a mutually agreeable resolution.									
06-24-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.000	350.00	350.00
	Meeting with Hill regarding case updates, mediation and trial.									
06-30-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.400	350.00	140.00
	Received, reviewed and responded to co-counsel's emails regarding Hill's discovery.									
07-01-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.500	350.00	175.00
	Received, reviewed and responded to co-counsel's emails regarding Hill's supplemental discovery.									

Time Entries

Law Offices of King & Murdaugh, LLC

Professional = Lakeisha Murdaugh (Active Only)
Group By: Professional Group
Client - Matter = Hill v. City of Hammond et al 2:10-
CV-393 (Active Only)
Task Code = All
View = Original
From 01-01-2022 To 01-27-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
07-14-2022	Approved		Billable	Email	Murdaugh, Lakeisha			1.100	350.00	385.00
				Received and reviewed email to opposing counsel regarding Hill discovery upload regarding Leroy Ford documents.						
08-16-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Received and reviewed email from opposing counsel regarding scheduling an attorney conference.						
08-17-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Received and reviewed email from co-counsel regarding defendant's filing.						
08-17-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.200	350.00	770.00
				Reviewed defendant's motion to strike expert witness. Researched case law.						
08-19-2022	Approved		Billable	Attorney Conference	Murdaugh, Lakeisha			1.000	350.00	350.00
				Attended conference with opposing counsel via MS Teams.						
08-19-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			2.000	350.00	700.00
				Meeting with Hill regarding case updates, mediation and trial.						
08-20-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			3.400	350.00	1,190.00
				Researched case law. Reviewed Connick v. Thompson, Morales and its progeny.						
08-22-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.500	350.00	175.00
				Received and reviewed email from co-counsel regarding response to defendant's motion to strike expert disclosures.						
08-23-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			0.800	350.00	280.00
				Reviewed draft 1983 complaint for consideration during upcoming mediation.						
08-29-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.500	350.00	525.00
				Meeting with Hill regarding case updates, mediation and trial.						
08-29-2022	Approved		Billable	Settlement Conference	Murdaugh, Lakeisha			1.500	350.00	525.00
				Meeting with opposing counsel in attempt to reach a mutually agreeable resolution.						
09-02-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Received and reviewed email regarding Hill's rejection of the settlement offer.						
09-15-2022	Approved		Billable	Court	Murdaugh, Lakeisha			0.500	350.00	175.00
				Attended status teleconference with court.						
09-19-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Received and reviewed email regarding pretrial order.						
09-19-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			0.500	350.00	175.00
				Review plaintiff's contributions to pretrial order.						
09-21-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.200	350.00	420.00
				Reviewed and drafted response to defendant's motion to strike witnesses.						
09-22-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Received and reviewed email from opposing counsel.						

Time Entries**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)
 Group By: Professional Group
 Client - Matter = Hill v. City of Hammond et al 2:10-
 CV-393 (Active Only)
 Task Code = All
 View = Original
 From 01-01-2022 To 01-27-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
09-23-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
				Received and reviewed email to/from opposing counsel.						
09-23-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.000	350.00	700.00
				Read 1982 trial transcript - State of Indiana v. James Hill. Take notes for trial. Prepare direct examination.						
09-24-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			6.500	350.00	2,275.00
				Read 1982 trial transcript - State of Indiana v. James Hill. Take notes for trial. Prepare direct examination.						
09-25-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.900	350.00	1,015.00
				Read 1982 trial transcript - State of Indiana v. James Hill. Take notes for trial. Prepare direct examination.						
09-26-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.300	350.00	455.00
				Read 1982 trial transcript - State of Indiana v. James Hill. Take notes for trial. Prepare direct examination.						
09-26-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.300	350.00	105.00
				Reviewed and responded to emails from co-counsel.						
09-28-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.500	350.00	875.00
				Reviewed defendant's pretrial order.						
09-28-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Reviewed email from co-counsel regarding defendant's proposed pretrial order.						
09-29-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.300	350.00	805.00
				Read 1982 trial transcript - State of Indiana v. James Hill. Take notes for trial. Prepare direct examination.						
09-30-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Review and analyze email from opposing counsel.						
10-02-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
				Received and reviewed email from co-counsel regarding polygraph examination.						
10-02-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			4.200	350.00	1,470.00
				Conducted research regarding jury instructions and motions in limine. Drafted proposed jury instruction and responses to MILs.						
10-03-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Reviewed and analyzed email from opposing counsel.						
10-06-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			3.300	350.00	1,155.00
				Read Mayes civil trial transcript. Take notes for trial. Prepare direct examination.						
10-08-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			3.000	350.00	1,050.00
				Read Mayes civil trial transcript. Take notes for trial. Prepare direct examination.						
10-08-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.300	350.00	105.00
				Reviewed and analyzed proposed stipulation for upcoming settlement conference.						
10-12-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
				Reviewed and analyzed email from co-counsel regarding Morales case.						

Time Entries

Law Offices of King & Murdaugh, LLC

Professional = Lakeisha Murdaugh (Active Only)
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Client - Matter = Hill v. City of Hammond et al 2:10-
CV-393 (Active Only)
Task Code = All
View = Original
From 01-01-2022 To 01-27-2023

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
10-12-2022	Approved		Billable	Attorney Conference	Murdaugh, Lakeisha			3.300	350.00	1,155.00
				Meeting with co-counsel to discuss trial preparation and strategies.						
10-14-2022	Approved		Billable	Draft Document	Murdaugh, Lakeisha			2.800	350.00	980.00
				Draft responses to MILs.						
10-14-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
				Sent email of draft MIL responses to co-counsels.						
10-15-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.400	350.00	140.00
				Received and reviewed emails from co-counsel regarding Brady obligation post trial.						
10-15-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			4.500	350.00	1,575.00
				Reviewed Silva and related case law regarding admissibility and materiality.						
10-16-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			1.500	350.00	525.00
				Legal research regarding Bertha Franklin document and the Brady duty post-conviction.						
10-19-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.700	350.00	245.00
				Reviewed and responded to emails from co-counsel regarding edited MIL responses.						
10-19-2022	Approved		Billable	Email	Murdaugh, Lakeisha			2.200	350.00	770.00
				Reviewed, analyzed and responded to emails from co-counsel regarding edited MIL responses and motion to reconsider.						
10-21-2022	Approved		Billable	Settlement Conference	Murdaugh, Lakeisha			3.000	350.00	1,050.00
				Meeting with opposing counsel in attempt to reach a mutually agreeable resolution.						
10-21-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
				Received and reviewed email regarding Hill's rejection of settlement offer.						
10-22-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			8.400	350.00	2,940.00
				Read deposition transcripts and other testimony of Michael Solan.						
10-23-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			5.200	350.00	1,820.00
				Read deposition transcripts and other testimony of Michael Solan.						
10-24-2022	Approved		Billable	Pretrial Conference	Murdaugh, Lakeisha			1.000	350.00	350.00
				Attended telephonic pretrial conference.						
10-25-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			3.400	350.00	1,190.00
				Conducted research regarding requirement to introduce trial transcript for 1983 claim.						
10-25-2022	Approved		Billable	Draft Document	Murdaugh, Lakeisha			0.800	350.00	280.00
				Drafted response to defendant's motion to read trial transcript as the first evidence is the case.						
10-25-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.500	350.00	525.00
				Read FPTC transcript and took trial notes.						
10-26-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.500	350.00	525.00
				Meeting with Hill regarding case updates, mediation and trial.						

Time Entries**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)
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 Client - Matter = Hill v. City of Hammond et al 2:10-
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 Task Code = All
 View = Original
 From 01-01-2022 To 01-27-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
10-27-2022	Approved		Billable	Efile	Murdaugh, Lakeisha			0.200	350.00	70.00
	Upload response to defendant's motion to read trial transcript as the first evidence is the case to electronic filing system.									
10-27-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			7.800	350.00	2,730.00
	Read deposition transcripts of James Hill and Thomas Vanes.									
10-27-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.800	350.00	980.00
	Read deposition transcripts of Thomas Vanes.									
10-28-2022	Approved		Billable	Efile	Murdaugh, Lakeisha			0.200	350.00	70.00
	Uploaded supplemental proposed jury instructions to electronic filing system.									
10-28-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			3.000	350.00	1,050.00
	Meeting with co-counsel and Thomas Vanes regarding upcoming trial.									
10-29-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
	Received, reviewed and responded to emails between co-counsel.									
10-29-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			7.800	350.00	2,730.00
	Read deposition transcripts of James Hill and Thomas Vanes.									
10-30-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			3.300	350.00	1,155.00
	Read deposition transcript and other testimony of James Hill.									
10-31-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.500	350.00	525.00
	Meeting with Hill regarding case updates, mediation and trial.									
10-31-2022	Approved		Billable	Court	Murdaugh, Lakeisha			0.800	350.00	280.00
	Attended telephonic court hearing regarding miscellaneous trial orders.									
11-02-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.400	350.00	140.00
	Received and reviewed email from Thomas Vanes regarding upcoming trial.									
11-04-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
	Received and reviewed email from co-counsel.									
11-05-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			8.000	350.00	2,800.00
	Reviewed relevant case documents and researched case law for trial purposes.									
11-06-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			6.500	350.00	2,275.00
	Reviewed relevant case documents and researched case law for trial purposes.									
11-06-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			2.000	350.00	700.00
	Meeting with Hill regarding case updates, mediation and trial.									
11-07-2022	Approved		Billable	Court	Murdaugh, Lakeisha			8.500	350.00	2,975.00
	Attended court for trial. Travel included.									
11-08-2022	Approved		Billable	Court	Murdaugh, Lakeisha			9.500	350.00	3,325.00
	Attended court for trial. Travel included.									

Time Entries**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)
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 Client - Matter = Hill v. City of Hammond et al 2:10-
 CV-393 (Active Only)
 Task Code = All

View = Original
 From 01-01-2022 To 01-27-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
11-09-2022	Approved		Billable	Court	Murdaugh, Lakeisha			9.500	350.00	3,325.00
	Attended court for trial. Travel included.									
11-10-2022	Approved		Billable	Court	Murdaugh, Lakeisha			5.500	350.00	1,925.00
	Attended court for trial. Travel included.									
11-10-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.700	350.00	595.00
	Read deposition transcript of Larry Furnas.									
11-14-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			5.500	350.00	1,925.00
	Meeting with Hill regarding trial preparation.									
11-15-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.500	350.00	875.00
	Read trial transcript of Solan's testimony and took notes.									
11-16-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			8.500	350.00	2,975.00
	Reviewed relevant case documents and researched case law for trial purposes. Prepared for Hill's Direct examination.									
11-17-2022	Approved		Billable	Court	Murdaugh, Lakeisha			9.000	350.00	3,150.00
	Attended court for trial. Travel included.									
11-18-2022	Approved		Billable	Court	Murdaugh, Lakeisha			9.000	350.00	3,150.00
	Attended court for trial. Travel included.									
11-19-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			5.800	350.00	2,030.00
	Researched case law regarding defendants' directed verdict motions									
11-20-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			6.000	350.00	2,100.00
	Reviewed relevant case documents and researched case law for trial purposes.									
11-21-2022	Approved		Billable	Court	Murdaugh, Lakeisha			11.500	350.00	4,025.00
	Attended court for trial. In-office conference with co-counsel regarding next day of trial. Travel included.									
11-22-2022	Approved		Billable	Court	Murdaugh, Lakeisha			12.000	350.00	4,200.00
	Attended court for trial. Received jury verdict. Travel included.									
11-23-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.300	350.00	455.00
	Meeting with Hill regarding trial outcome and future expectations.									
11-30-2022	Approved		Billable	Draft Document	Murdaugh, Lakeisha			1.200	350.00	420.00
	Drafted response to Defendant COH notice of additional authorities to support motion for directed verdict.									
11-30-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			0.800	350.00	280.00
	Drafted response to Defendant COH notice of additional authorities to support motion for directed verdict.									
12-01-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.000	350.00	350.00
	Reviewed defendant's reply to response motion.									
12-01-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.700	350.00	945.00
	Reviewed Defendant Solan's motion and brief in support.									

Time Entries**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)
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 Client - Matter = Hill v. City of Hammond et al 2:10-
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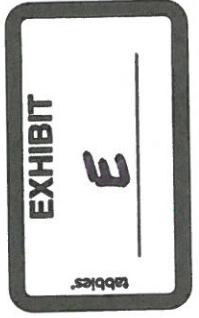
From 01-01-2022 To 01-27-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
James Hill										
Hill v. City of Hammond et al 2:10-CV-393										
12-02-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			3.200	350.00	1,120.00
		Conducted research regarding Defendant' Solan's motion and brief in suport.								
12-02-2022	Approved		Billable	Draft Document	Murdaugh, Lakeisha			4.400	350.00	1,540.00
		Drafted response to Defendant' Solan's motion and brief in suport.								
12-12-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			0.500	350.00	175.00
		Read draft motion for prejudgment interest.								
12-12-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			0.500	350.00	175.00
		Review draft motion to enter judgment on the verdict.								
12-12-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
		Received and reviewed email from co-counsel.								
12-13-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.000	350.00	700.00
		Reviewed motion and cited case law for miscellaneous relief.								
12-20-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.000	350.00	350.00
		Reviewed defendant's reply to response to motion.								
12-20-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			3.000	350.00	1,050.00
		Researched case law cited in defendant's reply to response to motion.								
12-22-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			2.500	350.00	875.00
		Researched case law in preparation of reply motion.								
12-29-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.800	350.00	630.00
		Reviewed reply motion and case law cited prior to filing.								
01-10-2023	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.200	350.00	420.00
		Reviewed joint sur-reply by defendants.								
01-10-2023	Approved		Billable	Document Review	Murdaugh, Lakeisha			0.100	350.00	35.00
		Reviewed court order.								
01-14-2023	Approved		Billable	Legal Research	Murdaugh, Lakeisha			6.500	350.00	2,275.00
		Read and analyzed case law cited in joint sur-reply by defendants. Research rebuttal cases.								
01-24-2023	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.200	350.00	420.00
		Received and read the court's opinion and order.								
Matter Total								309.800		108,430.00
Client Total								309.800		108,430.00
Grand Total								309.800		108,430.00

Activities Export

01/24/2023
9:36 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/05/2023	\$	Balance of fees for Expert Witness David Gibson ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00	\$2,387.04	-	\$2,387.04
11/14/2022	\$	Trial testimony of Solan ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00	\$582.25	-	\$582.25
10/25/2022	\$	Transcript for FPTC ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00	\$24.30	-	\$24.30
05/18/2022	\$	Expert witness David Gibson ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00	\$5,600.00	-	\$5,600.00
							\$0.00 0.00h	\$8,593.59 0.00h



STATE OF INDIANA)
) SS:
COUNTY OF LAKE)

AFFIDAVIT OF SCOTT KING

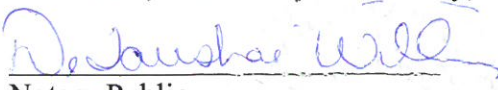
Scott King, first being duly sworn, states as follows:

1. I am the lead counsel for the plaintiff in the case of James Hill v. City of Hammond, et al, 2:10 CV 393.
2. I undertook representation of the plaintiff on December 26, 2017.
3. Prior to that time, the plaintiff was represented by attorney Mitchell Peters and others. Mr.Peters ceased his representation of the plaintiff on July 6, 2016.
4. At the time I undertook representation of the plaintiff, Lakeisha Murdaugh and Russell Brown were associated with me in my practice and the representation of the plaintiff.
5. Thereafter, beginning on January 1, 2022, Russell Brown initiated his own law practice but continued in his representation of the plaintiff along with affiant and Ms. Murdaugh.
6. I have reviewed Attachments A-E to the Plaintiff's Petition for Fees and Expenses and, to the best of my knowledge, information and belief, the information contained in those Attachments is accurate.

FURTHER AFFIANT SAITH NOT:

s/ Scott King
Scott King

SUBSCRIBED AND SWORN TO ME, A NOTART PUBLIC FOR THE STATE OF
INDIANA, this 6th Day of February, 2023.


Notary Public

My Commission Expires:

